UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK			
SECURITIES AND EXCHANGE COMMISSION, :			
]	Plaintiff,	: :	No. 09-CV-4329 (JGK)
-against-		: :	
JON-PAUL RORECH	and	: :	
RENATO NEGRIN,	Defendants.	: :	
		: X	

DEFENDANT RENATO NEGRIN'S NOTICE OF MOTION FOR JUDGMENT ON THE PLEADINGS

Please take notice that upon the attached memorandum of law, and upon the accompanying August 19, 2009 Declaration of Linda Fang and the exhibits attached thereto, defendant Renato Negrin hereby moves, pursuant to Federal Rule of Civil Procedure 12(c), for a judgment on the pleadings on the Securities and Exchange Commission's complaint for lack of subject matter jurisdiction and failure to state a claim.

Dated: New York, New York August 19, 2009

Respectfully submitted,

MORVILLO, ABRAMOWITZ, GRAND, IASON, ANELLO & BOHRER, P.C.

By: /s/ Lawrence Iason (LI 8996) Linda Fang (LF 3461) Claudio Ochoa (CR 7695)

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